

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

KENYADA BROOKS (Plaintiff)

-VS-

3:20cv321-NBB-JMV

CIVIL ACTION NO. _____

JUDGE _____

MAGISTRATE JUDGE _____

WAL-MART ASSOCIATES, INC. (Defendants)

WAL- MART STORES

CITY OF OLIVER BRANCH MISSISSIPPI

POLICE DEPARTMENT AND MAYOR SCOTT PHILIP

COMPLAINT

Now come the Plaintiff Kenyada Brooks, a citizen and taxpayer of the city of Bastrop, Parish of Morehouse , and State of Louisiana states the following: United States Western District Court of Louisiana shall have original jurisdiction of all civil actions arising under the constitution, laws, treaties of the United States.

Jurisdiction over the subject matter and federal question that the United States court is the proper venue to hear this procedure.

THIS COURT HAVE JURISDICTION OVER DIVERISTY CITIZENSHIP CASES 28 U.S. CODE S1332.

Diversity of citizenship; amount in controversy; cost. The district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value \$75, 000 exclusive of interest and costs and is citizens of difference states.

TITLE 18, U.S.C., SECTION 242- DEPRIVATION OF RIGHTS UNDER COLOR OF LAW

Act under 'color of any law' include acts not only done by federal , state, or local officials within the bounds or limits of their lawful authority, but also acts done without and beyond the bounds of their lawful authority ; provided that, in order for unlawful acts of any official to be done under 'color of any law', the unlawful acts must be done while such official is purporting of pretending to act in the performance of his/her official duties. This definition includes, in addition to law enforcement officials, individuals such as Mayors, Council persons, Judges, Nursing Home Proprietors, Security Guards, etc., persons who are bound by laws, and status, ordinances, or customs.

TITLE 18, U.S.C., SECTION 245 (2.F) – FEDERALLY PROTECTED ACTIVIES

Prohibits willfully injury, intimidation, or interference or attempt to do so, by force or threat of force of any person because of race, color, religion, or national origin and because of his/her activity as;

A patron of any accommodation, including hotels, motels, restaurants, lunchrooms, bars, gas stations, theaters... or any other establishment which serves the public and which is principally engaged in selling food or beverages for consumption on the premises.

THE DEFENDANTS HEREIN WILLFULLY KNOWING THAT THEY VIOLATED THE PLAINTIFF CONSTITUTIONAL RIGHTS OF THE 42 U.S.C. 1993 (1982)

When they wrongfully arrested her without possible cause, that she had committed a crime and arrested by not reading her Miranda Rights, and arrested without just cause.

1.

The plaintiff in this case is, Ms. Kenyada Shontel Brooks who is a citizen of the State of Louisiana and her mailing address is: 812 Commerce Ave., Bastrop, Louisiana, 318-499-1362.

2.

The Defendants in this case is:

Wal-Mart Associates Inc.
6807 SW 8TH Street Benton Arkansas 71716

3.

WAL-MART STORES
7950 CRAFT – GOODMAN FRONTIER ROAD
OLIVER BRANCH MISSISSIPPI 38654

4.

CITY OF OLIVER BRANCH MISSISSIPPI, POLICE
DEPARTMENT, AND MAYOR SCOTT PHILIP
9200 PIGEON ROAD OLIVER BRANCH, MS 38654

5.

On December 16, 2018 at 17:54 hours, I Kenyada Brooks was approached by a person in plain clothes whose later were identified himself as the name Ron. He stopped me and stated to me, asking me if I need some extra Christmas money?

6.

Then Ron asked a question, did you forget to scan a couple of items in your basket, I replied, no not to my knowledge.

7.

Then Ron ask me for my receipt, which I presented to him, and after I presented it to him, he then instructed me to follow him into a room and then he asked me fo

8.

Then Ron requested, asking me to take a photo picture, which I replied no, and I said, you have my identification sir.

9.

At that time an officer of the Oliver Branch Police Department arrived and after talking with Ron, then Ron presented the officer with some receipts. The officer stated to Ron in my present, would it be ok for her to pay for these items because she had some \$375.16 still left, as a balance on her receipt, and Ron stated, no I will lose my job.

10.

I was place in handcuff by the officer and led to the patrol car and later book into the Oliver Branch Police Station ,10470 Hwy 178, for processing. I was process and charge with shoplifting. After being process, I was bonded out on a \$1,000.00 bond and was giving a court day to appear, January 10, 2019.

11.

On January 21, 2018, I enter into a fix retained agreement authorizing attorney at law, The Washington Law Firm, PLLC to represent me in this shoplifting matter and the terms of the legal fees was fix in the amount of \$1,500.00.

12.

On and about April 12, 2019 I appear in the Oliver Branch Municipal Court and the charges for my arrest for shoplifting was dispose of by dismissal

13.

On November 21, 2018, I had been diagnosis with Multiple Sclerosis and since that time of the false arrest and false prosecution until this day, my (MS.) has increase severely in a short period of time and continue to progress at a rapid pace since the time of my false arrest and false prosecution.

Wherefore the plaintiff Kenyada Brooks pray that the honorable court grants the plaintiff punitive damages and all other damages and relief that this court find fit.

Respectably Submitted

Kenyada Brooks

Ms. Kenyada S. Brooks, Pro se

812 Commerce Ave.

Bastrop, La. 71220

Phone: (318)499-1362

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF LOUISIANA
OXFORD DIVISION

KENYADA BROOKS (Plaintiff)

VERSUS

CIVIL ACTION NO. _____

JUDGE _____

MAGISTRATE JUDGE _____

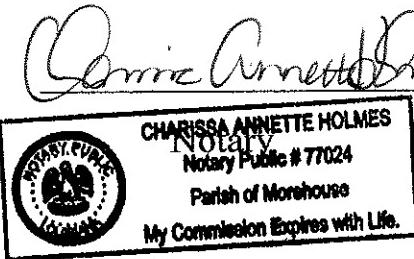
WAL-MART ASSOCIATES, INC. (Defendants)

WAL-MART STORES

AFFIDAVIT IN SUPPORT OF PLAINTIFF
COMPLAINT

I Kenyada Brooks the pro se plaintiff in the above and style case states the following statement herein is true to the best of my ability and knowledge.

I Kenyada Brooks personal appear undersign notary.



Charissa Annette Holmes Number 77024 Date 11/23/2020

Kenyada S. Brooks

Kenyada S. Brooks

812 Commerce Ave.

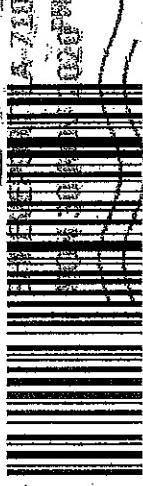
Bastrop, La. 71220

Phone: 318-499-1362

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS TO DRAFT LINE
OF THE RETURN ADDRESS TO DRAFT LINE

CERTIFIED MAIL

Kenyada Brooks
812 Commerce Avenue
Bastrop, LA 71220



7019 2970 DEPT 8035 4320

U.S. POSTAGE PAID
FROM LEGEN
BASTROP, LA
71220
NOV 30, 20
AMOUNT

\$8.40

R2305K131538-06



38655



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United States District Court
Northern District of Mississippi
911 Jackson Avenue East
Oxford, Mississippi 38655